

REMARKS/ARGUMENTS

Claims 1-3, 5-13, 20, and 22-31 are pending in the application.

Claims 1-3, 5, 6, 9-11, 22-24, and 28-30 are rejected in the Office Action under 35 U.S.C. 102(e) as being anticipated by Fuh et al., U.S. Patent 6,324,683 B1 ("Fuh et al.");

Claims 7, 8, 12, 13, 20, 27, and 31 are rejected in the Office Action under 35 U.S.C. 103(a) as being unpatentable over Fuh et al., and further in view of Schauser, U.S. Patent 6,331,855 B1 ("Schauser"); and

Claims 25 and 26 are rejected in the Office Action under 35 U.S.C. 103(a) as being unpatentable over Fuh et al.

2. Rejection of Claims 1-3, 5, 6, 9-11, 22-24, and 28-30 under 35 U.S.C. 102(e).

In Applicants' invention, a method and apparatus are provided for software vendors to provide technical assistance to their customers over the Internet. See, Field, Background, and Objects of the Invention on pages 1-2. Accordingly, the application program to be debugged resides on a client computer operated by a customer of the application program, and the debug program resides on a server computer controlled by the vendor of the application program. See, FIG. 1 and corresponding description on pages 6-7. When the user wants technical assistance in debugging the application program, the user initiates a debug request which is transmitted through an interface program over the Internet to the debug program residing on the server computer, and the

debug program and application interact so as to debug the application program. See, FIG. 4 and corresponding description on pages 9-12 of the application.

In contrast, in Fuh et al., a program such as a user defined function (UDF), stored procedure, or trigger executed in a relational database management system (RDBMS) is to be debugged by a user of a client computer. See, e.g., Abstract. These programs, however, reside on a server computer, not the client computer as in Applicants' case. See, e.g., Col. 2, lines 48-51 with regards to a stored procedure on the server computer; Col. 8, lines 1-4 with regards to a UDF on the server computer; and Col. 12, lines 45-46 with regards to the trigger being within the RDBMS, which in turn, is on the server computer (See, e.g., Col. 11, lines 52-55).

Because the program to be debugged in Fuh et al. resides on the server, it creates three problems— timing, authorization and remote debugging. See, e.g., Col. 7 line 59 to Col. 8, line 29. To eliminate these problems, the program to be debugged initiates the debugger, not the user of the client computer as in Applicants' case. Not only does Fuh et al. not teach that the user initiates the debugger, Fuh et al. teaches away from such action in order to overcome authorization problems (See, Col. 12, lines 15-19) and remote debugging problems (See, Col. 12, lines 19-25).

Accordingly, Claim 1 is believed to be patentable under 35 U.S.C. 102(e) over Fuh et al. since it claims the task of “detecting a debug request initiated by a user of a client computer to debug an application program on said client computer,” and such a task is neither taught nor suggested by Fuh et al. for the reasons stated above. In particular, Fuh et al. neither teaches nor suggests a “debug request initiated by a user of a client

computer,” and in fact, teaches away from such a task, and further, Fuh et al. neither teaches nor suggests “to debug an application program on said client computer,” because the whole purpose of Fuh’s invention is to debug external programs residing on the server computer, not the client computer. Also, it is not a simple matter of just reversing the roles of the client and server computers, because in the case of Fuh et al., neither the user of the server or client computer initiates the debugger, it is the program itself that is to be debugged that performs the initiating.

Claims 2, 3, 5 and 6 are also believed to be patentable under 35 U.S.C. 102(e) over Fuh et al. since they depend from Claim 1, and as such, are believed to be patentable for at least the same reasons as stated in reference to Claim 1.

Claim 9 is also believed to be patentable under 35 U.S.C. 102(e) over Fuh et al. since it claims an interface program for “detecting a debug request initiated by a user of a client computer to debug an application program on said client computer,” and such a task is neither taught nor suggested by Fuh et al. for the reasons stated above in reference to Claim 1.

Claims 10 and 11 are also believed to be patentable under 35 U.S.C. 102(e) over Fuh et al. since they depend from Claim 9, and as such, are believed to be patentable for at least the same reasons as stated in reference to Claim 9.

Claim 22 has been amended to claim the task of "receiving a request from a user of a client computer over the Internet to debug an application program of said client computer," and such a task is neither taught nor suggested by Fuh et al. for the reasons stated in reference to Claim 1. Accordingly, Claim 22 is also believed to be patentable under 35 U.S.C. 102(e) over Fuh et al. for the reasons stated in reference to Claim 1.

Claims 23 and 24 are also believed to be patentable under 35 U.S.C. 102(e) over Fuh et al. since they depend from Claim 22, and as such, are believed to be patentable for at least the same reasons as stated in reference to Claim 22.

Claim 28 has been amended to claim a debug program for "receiving a request from a user of a client computer over the Internet to debug an application program of said client computer," and such a debug program is neither taught nor suggested by Fuh et al. for the reasons stated in reference to Claim 1. Accordingly, Claim 28 is also believed to be patentable under 35 U.S.C. 102(e) over Fuh et al. for the reasons stated in reference to Claim 1.

Claims 29 and 30 are also believed to be patentable under 35 U.S.C. 102(e) over Fuh et al. since they depend from Claim 28, and as such, are believed to be patentable for at least the same reasons as stated in reference to Claim 28.

3. Rejection of Claims 7, 8, 12, 13, 20, 27, and 31 under 35 U.S.C. 103(a).

Claims 7 and 8 are also believed to be patentable under 35 U.S.C. 103(a) over Fuh et al. in light of Schauser since they depend from Claim 1, and as such, are believed to be patentable for at least the same reasons as stated in reference to Claim 1. Further, since the program to be debugged in Fuh et al. is on the server computer, not the client computer as in Applicants' invention, Fuh et al. does not teach or suggest the tasks of Claims 7 and 8 as being implemented in the client computer.

Even reversing the roles of the server and client computers does not support a rejection of these claims. For example, in order to combine the teachings of Fuh et al. and Schauser with respect to the transmission of a graphics file, there must be some suggestion in Fuh et al. to do so, and there is no such suggestion. Since Fuh et al. uses X-windows, the user's display (on the client) can be specified as the X-window server, enabling the UDF to be debugged remotely. See, e.g., Col. 12, lines 27-30. There is no suggestion that this approach is inadequate in any way. Therefore, there is no suggestion that it would be desirable to send graphics files including pixel information as claimed in Claim 7.

Claims 12 and 13 are also believed to be patentable under 35 U.S.C. 103(a) over Fuh et al. in light of Schauser since they depend from Claim 9, and as such, are believed to be patentable for at least the same reasons as stated in reference to Claim 9, as well as those stated in reference to Claims 7 and 8.

Claim 20 is also believed to be patentable under 35 U.S.C. 103(a) over Fuh et al. in light of Schauser for the same reasons as stated in reference to Claims 1 and 7.

Claim 27 is also believed to be patentable under 35 U.S.C. 103(a) over Fuh et al. in light of Schauser since it depends from claim 22, and as such, is believed to be patentable for at least the same reasons as stated in reference to claim 22 as well as the reasons stated in reference to claim 7.

Claim 31 is also believed to be patentable under 35 U.S.C. 103(a) over Fuh et al. in light of Schauser for the same reasons as stated in reference to Claims 1 and 7.

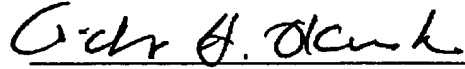
3. Rejection of Claims 25 and 26 under 35 U.S.C. 103(a).

Claims 25 and 26 are believed to be patentable under 35 U.S.C. 103(a) over Fuh et al., since they depend from Claim 22, and as such, are believed to be patentable for at least the same reasons as stated in reference to Claim 22. Further, these claims resist any argument that the roles of the server and client computers may simply be reversed in applying the teachings of Fuh et al. to Applicants' claims.

Claims 1-3, 5-13, 20, and 22-31 are pending in the Application. Reconsideration of the rejections of the claims is requested for the reasons stated herein, and notice of their allowance earnestly solicited.

Respectfully submitted,

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